

United States Bankruptcy Court
Eastern District of Wisconsin

In Re: Darlene Allen

Chapter: 13

Case: 16-20411-GMH

NOTICE OF MOTION FOR CONTINUATION OF THE AUTOMATIC STAY PROVISIONS OF
11 U.S.C. SEC. 362
(AND) NOTICE OF REQUIREMENT TO FILE AN OBJECTION AND ATTEND A HEARING
ON THE MATTER

Please take notice that on January 20, 2016 the debtor, by the undersigned attorney, filed a Motion with the court to continue the automatic stay under 11 U.S.C. §362 of the Bankruptcy Code. A copy of the motion is attached.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the motion, then you or your attorney **must**:

File a written objection with the court, so that it is received prior to the hearing date **(On or before February 3, 2016)**. Your objection must be in writing (and) be filed with the clerk of the U.S. Bankruptcy Court, located at
517 E. Wisconsin Ave, Milwaukee, WI 53202


If you do not file an objection with the court, then the court may find that you do not oppose the relief requested and may continue the Automatic Stay without the hearing.

Only if you file a written objection, you must then **also; Attend the hearing** on the motion which is scheduled to be held on **Tuesday, February 16 at 2:30 PM**, the hearing will be held at:

**US Bankruptcy Court,
517 E. Wisconsin Ave,
Milwaukee, WI 53202
Courtroom 133**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought and may enter an order granting relief.

Dated: January 20, 2016 at Milwaukee, Wisconsin.



Shane S. Cigel 1047198
Law Office of Dantzman & Dantzman
324 E. Wisconsin Ave, Suite 1444
Milwaukee, WI 53202
(414) 831-0427

**United States Bankruptcy Court
Eastern District of Wisconsin**

In Re: Darlene Allen

Chapter: 13

Case: 16-20411-GMH

**MOTION BY DEBTORS FOR CONTINUATION OF THE AUTOMATIC STAY PROVISIONS OF
11 U.S.C. § 362(c)(3)**

Darlene Allen, by her attorney, Shane S. Cigel, moves the court to extend the automatic stay as to all creditors pursuant to 11 U.S.C. §362(c)(3). In support of this motion the movant states as follows:

1. Debtor had one previous case under Title 11, a Chapter 13 bankruptcy, dismissed within 1 year of filing this present Chapter 13 bankruptcy. That case, 12-36883-MDM, was dismissed by an Order of the Court dated on or about August 19th, 2015.
2. That since the dismissal of the previous bankruptcy, there has been a substantial change in the financial affairs of the Debtor. (See attached Affidavit in Support of Motion)
3. These changes have allowed the Debtor to re-file an effective plan for reorganization, which should result in a confirmed plan, and which the Debtor can now fully perform.
4. Moreover, the Debtor's proposed plan and changed circumstances represents clear and convincing evidence of her good faith.

WHEREFORE, the Debtor, pursuant to 11 U.S.C. §362(c)(3), prays for an Order from the Court granting a continued automatic stay as to all her creditors.

Dated: January 20, 2016 at Milwaukee, Wisconsin.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Shane S. Cigel', written over a horizontal line.

Shane S. Cigel 1047198
Law Office of Dantzman & Dantzman
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Milwaukee, WI 53202
(414) 831-0427

United States Bankruptcy Court
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Debtor.

STATE OF WISCONSIN)
) SS
MILWAUKEE COUNTY)

AFFIDAVIT IN SUPPORT OF MOTION TO CONTINUE THE AUTOMATIC STAY

Now comes the debtor, **Darlene Allen** who states under penalty of perjury, based upon her own personal knowledge:

1. I have had one prior chapter 13 dismissed within the last year, that case, no. 12-36883-MDM, was dismissed on or about August 19, 2015.
2. Since the dismissal of the prior bankruptcy case I have had a significant change in my financial affairs. Specifically, I am eligible for a discharge in the present case, which I was not eligible for in my last case.
3. Also, my proposed plan payments will be significantly less than what they were in my last case, which will assist me in making my monthly Chapter 13 plan payments.
4. I continue to have regular, full time employment, and support from my live-in daughter, who pays the utility and phone bill.
5. These positive changes will allow me to regularly fund my chapter 13 plan and make my mortgage payments on a timely basis.
6. I am filing this bankruptcy in good faith, under the belief that I will be able to complete my plan of reorganization and obtain a successful discharge.

I declare under penalty of perjury that I have read the foregoing affidavit and that it is true and correct to the best of my knowledge, information and belief.

Dated: 1/18/2016

Darlene Allen
Darlene Allen

Subscribed and sworn to before me
This 18th day of January 2016.

CAUSE
Notary Public, State of Wisconsin
My commission is permanent.

Penalty for making a false statement of concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both. 18 USC §§ 152 and 3571

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CERTIFICATE OF MAILING

The undersigned, an Attorney, does hereby certify that a copy of this **Motion and Notice of Requirement to File an Objection and attend a Hearing** was mailed to the parties listed below, at their respective addresses, properly enclosed in a postage prepaid envelope, by depositing in the U.S. Mail at 324 E. Wisconsin Ave, Suite 1444, Milwaukee, WI 53202, on January 20, 2016

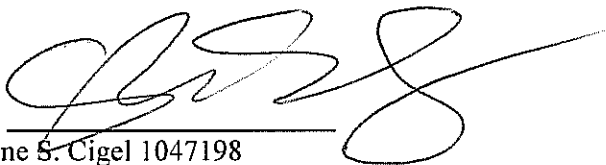
Chapter 13 Trustee, Mary Grossman (via ECF noticing)

US Trustee (via ECF noticing)

Darlene Allen, 7726 W. Winfield Ave., Milwaukee, WI 53218

Creditors (See attached matrix)

Dated: **January 20, 2016**

By: 

Shane S. Cigel 1047198
Law Office of Dantzman & Dantzman
324 E. Wisconsin Ave, Suite 1444
Milwaukee, WI 53202
(414) 831-0427

IRS
Insolvency Unit
211 W. Wisconsin Avenue
MS 5301 MIL
Milwaukee, WI 53203-2221

Wisconsin Department of Revenue
Special Procedures Unit
PO Box 8901
Madison, WI 53708-8901

IRS - Centralized Insolvency Operations
PO Box 7346
Philadelphia, PA 19101-7346

Aes/Netnet
Po Box 61047
Harrisburg, PA 17106

Afni, Inc.
Po Box 3097
Bloomington, IL 61702

Ashford University
400 North Bluff Blvd.
Clinton, IA 52732

At & t Bankruptcy
PO Box 769
Arlington, TX 76004

Caine & Weiner
PO Box 5010
Woodland Hills, CA 91365

Caine Weiner
21210 Erwin Street
Woodland Hills, CA 91367

Capital One
PO Box 30285
Salt Lake City, UT 84130-0285

Cavalry Portfolio Services, LLC
PO Box 27288
Tempe, AZ 85285-7288

Chase
P.O. Box 24696
Columbus, OH 43224

Children's Hospital of Wisconsin
PO Box 1997
9000 W. Wisconsin Ave
Milwaukee, WI 53201

Children's Hospital of Wisconsin
Drawer 531
Milwaukee, WI 53278

City of Milwaukee
841 North Broadway Room 406
Milwaukee, WI 53202

City of Milwaukee
200 E Wells Street
Milwaukee, WI 53202

Credit Management LP
4200 International Parkway
Carrollton, TX 75007

Dept Of Ed/Navient
PO Box 9635
Wilkes Barre, PA 18773

Dish Network
Attn: PO Box 6633
Englewood, CO 80112

Enhanced Recovery Co L
8014 Bayberry Rd
Jacksonville, FL 32256

Enhanced Recovery Corporation
8014 Bayberry Rd
Jacksonville, FL 32256

Enterprise Rent A Car
Attn: Collections
S17 W22650 Lincoln Ave
Waukesha, WI 53187

Gray & Associates, L.L.P.
16345 W. Glendale Dr.
New Berlin, WI 53151

HSBC Bank
PO Box 5253
Carol Stream, IL 60197

Hsbc/Tax
Po Box 1809
Jacksonville, FL 32220

Hsbc/Tax
Po Box 15524
Wilmington, DE 19850

Ice Mountain Spring Water Co
PO Box 856680
Louisville, KY 40285-6680

Kahuna Payment Solutions
1602 Tullamore Avenue
Bloomington, IL 61704

Kohn Law Firm S.C.
735 N. Water #1300
Milwaukee, WI 53202

M Casey Chiro-Care LLC
PO Box 180680
Delafield, WI 53018-0680

Northstar Loans
6215 N. Teutonia Ave
Milwaukee, WI 53209

Profess Acct
633 W Wisconsin Av
Milwaukee, WI 53203

Sprint
6391 Sprint Parkway
Attn: Bankruptcy Services
Overland Park, KS 66251-2850

Time Warner Cable
P.O. Box 3237
Milwaukee, WI 53201-3237

WE Energies
Attn: Bankruptcy Department - A130
PO Box 2046
Milwaukee, WI 53201-2046

Wisconsin Electric Power
231 W Michigan St # A130
Milwaukee, WI 53203